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July 13, 2021

By ECF

The Honorable Kimba M. Wood  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 100075

MEMO ENDORSED

Re: United States v. Joseph Asan  
20 Cr. 86 (KMW)

Dear Judge Wood:

On December 23, 2020, Mr. Asan appeared before the Honorable Barbara C. Moses and pled guilty to Count One of the above-referenced Indictment charging him with conspiring with others to commit bank and wire fraud. Sentencing is scheduled for July 27, 2021 at 12:30 p.m. The defense writes now to respectfully request that sentencing be adjourned to August 23<sup>rd</sup>, 24<sup>th</sup>, or 25<sup>th</sup>, 2021.

Given the disruptions caused by the COVID-19 pandemic and defense counsel's current workload, it has been uniquely difficult to meaningfully consult with Mr. Asan (who resides in Florida), locate and gather critical sentencing information, and have adequate time to effectively prepare for this sentencing. It is for these reasons that I respectfully request this additional time to prepare for Mr. Asan's sentencing.

A.U.S.A. Sagar Ravi has kindly consented to this adjournment request on behalf of the government.

Thank you.

Respectfully,

/s/ Matthew J. Kluger  
Matthew J. Kluger, Esq.

SO ORDERED: N.Y., N.Y. 7/13/21

Kimba M. Wood

KIMBA M. WOOD  
U.S.D.J.

Sentencing is adjourned to  
September 2, 2021, at 12:30 p.m.  
Defendant's submission is due by  
August 19. Government submission  
cc: AUSA Sagar K. Ravi  
is due by August 26.